

ANDREA VALDEZ (Cal. Bar No. 239082)
530 S. Lake Avenue, No. 574
Pasadena, CA 91101
Tel: (626) 817-6547
andrea.valdez.esq@gmail.com

JOSEPH SCOTT ST. JOHN (*pro hac vice*)
514 Mockingbird Drive
Long Beach, MS 39560
Tel: 410-212-3475
jscottstjohnpublic@gmail.com

Attorneys for Objector Douglas W. St. John

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT) ANTITRUST LITIGATION

Master File No. 3:07-cv-5944 JST

MDL No. 1917

DECLARATION OF ATTORNEY
JOSEPH SCOTT ST. JOHN ISO
DOUGLAS W. ST. JOHN'S
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL

This Document Relates To:
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

Special Master: Hon. Martin Quinn

1 I, Joseph Scott St. John, declare and state as follows:

2 1. I am an attorney duly licensed in the State of Mississippi, the State of Louisiana, and
3 the District of Columbia. I represent Douglas W. St. John, a resident of the State of Mississippi, in
4 connection with the above-captioned matter.

5 2. I make this declaration in support of Objector Douglas W. St. John's Administrative
6 Motion to File Documents Under Seal.

7 3. I have personal knowledge of the facts stated herein, and if called and sworn as a
8 witness, I would testify truthfully as follows.

9 4. Mr. St. John seeks to file the following document(s) under seal:

10 Exhibit 10 to the Declaration of Attorney Joseph Scott St. John ISO Objector Douglas W.
11 St. John's Objection to Report & Recommendation, which includes the following
12 documents:

- 13 1. DECLARATION OF MARIO N. ALIOTO IN SUPPORT OF INDIRECT
14 PURCHASER PLAINTIFFS' REPLY RE: FINAL APPROVAL OF CLASS
15 ACTION SETTLEMENTS WITH THE PHILIPS, PANASONIC, HITACHI,
16 TOSHIBA, SAMSUNG SDI, THOMSON AND TDA DEFENDANTS
(dated December 23, 2015)
- 17 2. ALIOTO EX. 1, SDCRT-0071129 (HIGHLY CONFIDENTIAL)
- 18 3. ALIOTO EX. 2, SDCRT-0009234 (HIGHLY CONFIDENTIAL)
- 19 4. ALIOTO EX. 3 CHU00647932 (CONFIDENTIAL) AND
20 CHU00647945 (CONFIDENTIAL)
- 21 5. ALIOTO EX. 4 SDCRT-0203701 (HIGHLY CONFIDENTIAL)
- 22 6. ALIOTO EX. 5 HDP-CRT00056081 (HIGHLY CONFIDENTIAL)
- 23 7. ALIOTO EX. 6 SDCRT-0062013 (HIGHLY CONFIDENTIAL)
- 24 8. ALIOTO EX. 7 PHLP-CRT-093612 (CONFIDENTIAL)
- 25 9. ALIOTO EX. 8 EXCERPTS (PAGES 1, 193-194) FROM DEPOSITION OF
26 JIM SMITH (dated December 12, 2013) (HIGHLY CONFIDENTIAL). Upon
27 information and belief, Mr. Smith's testimony was designated highly confidential by
28 Philips or LPD.
10. ALIOTO EX. 9 EXCERPTS (PAGES 1, 31) FROM DEPOSITION OF
JAEIN LEE (dated June 6, 2012) (HIGHLY CONFIDENTIAL). Upon information
and belief, Mr. Lee's testimony was designated highly confidential by Samsung SDI
Co., Ltd.

- 1 11. ALIOTO EX. 10 MTPD-0164693 (CONFIDENTIAL)
- 2 12. ALIOTO EX. 11 EXCERPTS (PAGES 223, 251) FROM DEPOSITION OF
- 3 W.R. KIM (dated July 2, 2014) (HIGHLY CONFIDENTIAL). Upon information
- 4 and belief, Mr. Kim's testimony was designated as highly confidential by Samsung
- 5 SDI Co., Ltd.
- 6 13. ALIOTO EX. 12 SDCRT-0002526 (HIGHLY CONFIDENTIAL) (with
- 7 translation)
- 8 14. ALIOTO EX. 13 SDCRT-0002506 (HIGHLY CONFIDENTIAL) (with
- 9 translation)

10 5. Each of the documents that Mr. St. John seeks to file under seal contain either (a)

11 material designated by Defendants pursuant to the Stipulated Protective Order (D.E. 306, amended

12 at D.E. 1142, June 18, 2008) as "Confidential" or "Highly Confidential" or (b) analysis of, references

13 to, or information taken directly from material designated by Defendants pursuant to the Stipulated

14 Protective Order as "Confidential" or "Highly Confidential."

15 6. Further declarant sayeth not.

16 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED
17 STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

18 Executed in New Orleans, Louisiana this 4th day of February, 2016.

19
20 /s/ Joseph Scott St. John

21
22 Joseph Scott St. John

CERTIFICATE OF SERVICE

I, Joseph Scott St. John, declare as follows: I am an attorney representing objector Douglas W. St. John connection with the above-captioned action. My address is 514 Mockingbird Drive, Long Beach, MS 39560. I am not a party to the above-captioned action, and I am over the age of eighteen. On February 4, 2016, I served copies of the foregoing declaration via ECF.

/s/ Joseph Scott St. John

DECLARATION OF ATTORNEY JOSEPH SCOTT ST. JOHN
Master File No. 3:07-cv-5944 JST (MDL No. 1917)